

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

---

ALEKSEY RUDERMAN,  
ARTURO SALDIVAR,  
CHRIS POCKNELL,

Plaintiffs,

CASE NO. 23cv1336

v.

KENOSHA COUNTY,  
KENOSHA COUNTY SHERIFF'S DEPARTMENT,  
DAVID G. BETH, ROBERT HALLISY,  
LARRY APKER, MARC LEVIN,  
JUSTIN MILLER, and  
LT. BILL BETH,

Defendants.

---

**NOTICE OF SPECIAL APPEARANCE**

---

PLEASE TAKE NOTICE that Attorney Remzy D. Bitar appears on behalf of Defendants, in the above-entitled action, objecting to the jurisdiction of the court and appearing specially without waiving challenges to the sufficiency of jurisdiction, service, or the Court's competency to proceed due to lack of service, and hereby request copies of all proceedings in this action subsequent to the Summons and Complaint to be served upon us.

Dated this 6<sup>th</sup> day of November, 2023.

**MUNICIPAL LAW & LITIGATION  
GROUP, S.C.**

Attorneys for Kenosha County, Kenosha County  
Sheriff's Department, David G. Beth, Robert  
Hallisy (Special Appearance), Larry Apker, Marc  
Levin, Justin Miller, and Bill Beth.

By: /s/ Electronically signed by Remzy D. Bitar  
REMZY D. BITAR

730 N. Grand Avenue  
Waukesha, WI 53186  
O: (262) 548-1340  
F: (262) 548-9211  
E: [rbitar@ammr.net](mailto:rbitar@ammr.net)  
[mreginato@ammr.net](mailto:mreginato@ammr.net)  
[sschmid@ammr.net](mailto:sschmid@ammr.net)  
[ameyers@ammr.net](mailto:ameyers@ammr.net)

State Bar No: 1038340  
MATTEO REGINATO  
State Bar No: 1089724  
SAMANTHA R. SCHMID  
State Bar No: 1096315  
ADAM MEYERS  
State Bar No: 1112804